

The Honorable Grady J. Leupold

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DAVID MICHAEL EDDO,  
Defendant.

NO. MJ25-5229

COMPLAINT FOR VIOLATIONS  
18 U.S.C. § 922(g)(1)

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BEFORE, Grady J. Leupold, United States Magistrate Judge, United States  
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Unlawful Possession of Ammunition)**

On or about June 12, 2025, in Pierce County, within the Western District of  
Washington, DAVID MICHAEL EDDO, knowing he had been convicted of the  
following crime punishable by a term of imprisonment exceeding one year:

i. *Assault in the Second Degree and Drive-By Shooting*, in Pierce  
County Superior Court, under case number 19-1-04379-4, on or about November 14,  
2019, with a sentence imposed of 26 months.

1 did knowingly possess, and did aid and abet the possession of, in and affecting  
2 interstate and foreign commerce, ammunition, to wit: two different types of rifle  
3 ammunition was found, with 21 rounds total, that had been shipped and transported in  
4 interstate and foreign commerce.

5 All in violation of Title 18, United States Code, Section 922(g)(1).

6 And the complainant states that this Complaint is based on the following  
7 information.

8 I, Josiah Rabon, a Special Agent of the United States Department of Justice,  
9 Federal Bureau of Investigations (FBI) being first duly sworn on oath, depose and say:

10 **INTRODUCTION**

11 1. The information in this Affidavit is provided for the limited purpose of  
12 establishing probable cause and is not a complete statement of all the facts related to this  
13 case. I have reviewed the facts of the case in this investigation; however, the investigation  
14 is still ongoing. Based on this, I am familiar with the facts and circumstances of this  
15 investigation.

16 **AFFIANT BACKGROUND AND EXPERIENCE**

17 2. I, Josiah Rabon, am a Special Agent of the Federal Bureau of Investigation  
18 (FBI) assigned to the Seattle Division, Tacoma Resident Agency where I am a member of  
19 the South Sound Joint Terrorism Task Force (JTTF). I have been employed as a Special  
20 Agent with the FBI since December of 2020. In my duties as a Special Agent, I am  
21 charged with investigating potential violations of federal law, including but not limited  
22 to, Weapons of Mass Destruction (WMD) and matters concerning the national security of  
23 the United States of America.

24 3. The facts set forth in this affidavit are based upon my own personal  
25 knowledge; knowledge obtained from other individuals during my participation in this  
26 investigation; review of documents and records related to this investigation;  
27 communications with others who have personal knowledge of the events and

1 circumstances described herein; and information gained through my training and  
2 experience.

3 4. Because this affidavit is submitted for the limited purpose of establishing  
4 probable cause, it does not set forth each and every fact that I or others have learned  
5 during the course of this investigation. I have set forth only the facts that I believe are  
6 relevant to the determination of probable cause to that David Michael EDDO has  
7 committed violations of Title 18, United States Code, Section 922(g)(1).

8 **EDDO'S PRIOR CONVICTION**

9 5. I have reviewed EDDO's criminal history. On June 9, 2022, EDDO was  
10 convicted of one count of Assault in the Second Degree and one count of Drive-by  
11 Shooting, both Class B felonies, in Pierce County Superior Court under case number 19-  
12 1-04379-4. On July 25, 2022, EDDO was sentenced to a total term of 26 months in  
13 prison, followed by 18 months of community custody.

14 6. On November 14, 2019, at approximately 4:29 p.m. Pacific Standard Time,  
15 Fife Police Department responded to assist Washington State Patrol with a shots-fired  
16 situation at the on-ramp to the Port of Tacoma Road to southbound I-5. Multiple reports  
17 came in by passing motorists that an active shooting was taking place and a white male  
18 with a beard, wearing a baseball cap and a black hoodie was firing on the driver of a  
19 tractor-trailer truck. The driver of the tractor-trailer truck was on the line with 911 and  
20 was reporting the suspect vehicle plate as WA-AQM6419, a silver Saturn that was  
21 directly in front of him. Law enforcement responded to the scene. The driver of the  
22 Saturn, EDDO, was still in the vehicle and was the only occupant of the vehicle.  
23 According to a witness, it appeared that EDDO was trying to shoot the driver of the  
24 tractor-trailer truck. These facts are memorialized in the State of Washington vs. David  
25 Michael Eddo Case in the Superior Court of Washington for Pierce County (No. 19-1-  
26 04379-4).

## INVESTIGATION

7. On May 7, 2025, at 5:07 p.m. Eastern Standard Time, the FBI National Threat Operations Center (NTOC) received a report of a manifesto written by David Michael EDDO about building a bomb. After receiving the tip, NTOC contacted the Seattle Field Office to inform them of the situation for awareness and prioritization.

8. The NTOC report indicated the manifesto was written as if EDDO had already built the bomb. The writing style and the details of the manifesto are consistent with previous filings by EDDO to include a "Grievance Against A Lawyer" received by the Office of Disciplinary Counsel, Washington Bar Association in April 2023, and a Motion to Dismiss filed at the Pierce County Clerks Office in December 2023 (No. 19-1-04379-4).

9. The following excerpts describe in detail, EDDO's motivations, intentions and capabilities to carry out an attack as outlined in his manifesto:

- "Why build a bomb and detonate it in a populated area? Because I've tried for 20 years to obtain Justice in his murder..." (understood to be David's father, Kenneth Eddo).
- "after being assaulted with a semi truck on my way home from work at 4:10 pm on 11-14-2019. I dumped a magazine of ammunition into the cab of that semi truck I didn't not strike the driver though at all I could have killed him many times over I had multiple magazines of ammunition in my vehicle at the time (legally) I should add I had over 45 rounds of ammunition with me two 15 round clips and one 10 round clip...because nobody just decides to commit a senseless act of violence against others for no reason."
- "I will not and choose not to be incarcerated illegally again that's why it was a suicide bomb....they owe me over 4.120 million dollars plus compounded interest in my fathers murder."
- "I choose this method because I don't want to go back to prison I'm not a criminal. To make a scene big enough for the world to examine my actions and why."
- "This isn't the first bomb I've built either I built my first bomb when my oldest son was 14 years of age I taught him how to build these at that age to be able to defend this country against tyrants. I disassembled it and tested and timed the build to be able to replicate it quickly if things did not go correctly in the courts that refuse to hear us. Nobody wants this bomb

1 because its 2.2 times more explosive than TNT I'm a kind patient man but  
 2 twenty years is too long to wait for the money and they haven't made any  
 3 progress in paying us or informed us of how to obtain assistance for the  
 4 situation.

- 5 • "After repeated hardships by these people I decided to build a bomb to
- 6 strike back."
- 7 • **"That's why I built a bomb that's why it was detonated in a public**
- 8 **place and killed many innocent people. I got a few guilty people at the**
- 9 **same time."**

10 At the end of the manifesto, EDDO specifically named seven individuals and  
 11 some of their home addresses. The named individuals were directly involved in his  
 12 previous legal proceedings.

13 10. Almost 18 years ago, EDDO's father, Kenneth Eddo, was killed in an  
 14 accident at the Port of Tacoma. Since that event, EDDO began to seek justice for his  
 15 family. EDDO claims his father was murdered and believes the NSA was involved. This  
 16 event was litigated in Nancy Eddo vs China Starforest Plywood in the Superior Court of  
 17 Washington for Pierce County (No. 072101395). Following a successful lawsuit for the  
 18 accident, the Eddo family was awarded approximately \$4 million. However, they were  
 19 unable to collect the damages. After learning this, EDDO's focus shifted to how he could  
 20 carry out an act of violence if his family does not receive what they were owed.

21 11. Several packages were delivered to EDDO's home which contained  
 22 HAZMAT symbols. One bag was labeled Potassium Nitrate Technical Grade. On June  
 23 11, 2025, a search of records was completed by the Department of Labor and Industries  
 24 for the Explosive Licensing Program. It was determined that EDDO has not applied for  
 25 or been issued any type of explosive license to purchase, use, store, or manufacture  
 26 explosives, including an IED (Improvised Explosive Device). According to investigators,  
 27 potassium nitrate is routinely used in the production of black powder or gun powder,  
 most nitro-organics (such as TNT, PETN, RDX, etc), flashless powder, nitroglycerine,  
 Russian brown powders, Thermite, Urea nitrate. Potassium nitrate could be used in the  
 production of a homemade explosive (HME).

1           12. On June 12, 2025, the following items were collected pursuant to a Search  
2 Warrant of EDDO's residence issued by the Superior Court of the State of Washington:

- 3           ○ Ammonium Perchlorate – 6 lbs / Potassium Nitrate / Potassium Perchlorate
- 4           / Red Iron Oxide
- 5           ○ Aluminum Powder
- 6           ○ Sulfur Powder / Grey Metallic Ribbon
- 7           ○ Acetone / Ball bearings / Other Explosive Device Components
- 8           ○ Cardboard Box, (1) 9mm Round
- 9           ○ **Plastic Box Containing Ammunition**
- 10          ○ Plastic Bag with Washers and Pencil
- 11          ○ Magnesium Powder with Striker
- 12          ○ (3) small Oxygen Canisters / (1) Large Oxygen Canister
- 13          ○ Pistol Lower Receiver
- 14          ○ Backpack Containing Bear Spray and Other Items
- 15          ○ Safety Fuse
- 16          ○ Shell with Fuse
- 17          ○ Electric Matches
- 18          ○ E-Match Kit

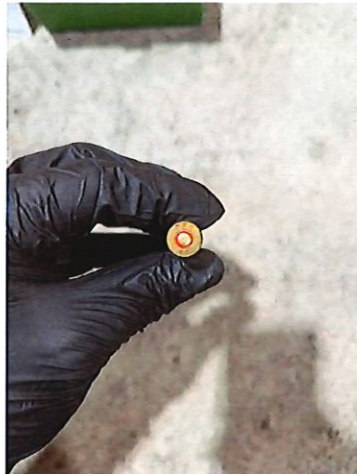
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1 According to a preliminary determination made by the Bureau of Alcohol,  
2 Tobacco, Firearms and Explosives (ATF) Special Agent Brian Arnold, the ammunition  
3 discovered in EDDO's residence was not made in the State of Washington, thereby it had  
4 been shipped and transported in interstate and foreign commerce.









13. Concurrent to the Search Warrant executed at EDDO's residence, Special Agents David Narrance and Miguel Castro conducted an interview of EDDO at the FBI Seattle Field Office. During the interview, EDDO extensively discussed the death of his father at the Port of Tacoma and his theories surrounding the event. The agents reviewed the documentation that EDDO provided. In addition, EDDO admitted to building a bomb several years ago and showed the interviewing agents a video of the detonation during the interview. EDDO initially denied writing a manifesto but later stated he often forgets things that he says. EDDO also admitted the ammo was his, but described it to be military, armor piercing ammunition from the 1940s or 1950s that his uncle gave to his father and he subsequently inherited. The entirety of the interview was recorded and will be maintained as evidence in the case file.

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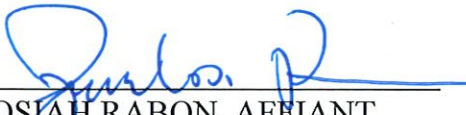
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CONCLUSION

14. Based on the above facts, I respectfully submit that there is probable cause to believe that David Michael EDDO did knowingly and intentionally possess ammunition in violation of Title 18, United States Code, Section 922(g)(1).

15. I am submitting this Complaint by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

  
JOSIAH RABON, AFFIANT  
Special Agent, FBI

The above-named agent provided a sworn statement attesting to the truth of the contents of the forgoing Affidavit on the 13th day of June 2025. The Court hereby finds that there is probable cause to believe the defendant committed the offenses set forth in the Complaint.

  
HON. GRADY J. LEUPOLD  
United States Magistrate Judge